

EXHIBIT “F”

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

SUNIL KUMAR, Ph.D., PRAVEEN) Case No.
SINHA, Ph.D.,) 2:22-cv-07550
) RGK-MAA
)
Plaintiffs,)
)
v.)
)
DR. JOLENE KOESTER, in her)
official capacity as)
Chancellor of California)
State University,)
)
)
Defendants.)
_____)

VIDEOTAPED DEPOSITION OF
PRAVEEN SINHA, Ph.D.
Zoom Remote Location
August 11, 2023
TOTAL PAGES 177
(PAGES 162 THROUGH 163 MARKED CONFIDENTIAL)

REPORTED BY: BOBBIE HIBBLER, CSR NO. 12475

Praveen Sinha, PhD, 8/11/2023

1 definition there will be differences in these 10:25

2 categories predominantly based on occupation. 10:25

3 Some have tried to push it in the form of 10:25

4 hierarchy. But these are occupational categories. 10:25

5 **BY MR. MICHALOWSKI:** 10:25

6 **Q. Where do Dalits fit into the caste** 10:25

7 **system that you described?** 10:25

8 **MR. TWERSKY: Objection.** 10:25

9 A. You're mixing couple of things. As I 10:25

10 mentioned earlier caste is a imposed structure of 10:25

11 Hindus in India by the British. There is no 10:25

12 system as per Hindu religion. It's a varna system 10:25

13 and the jati system. J-A-T-I is jati. Varna is 10:25

14 V-A-R-N-A. The two have been misrepresented in 10:25

15 the form of caste. And, now there are multiple 10:25

16 stereotypes for people because of that. 10:26

17 **BY MR. MICHALOWSKI:** 10:26

18 **Q. My question was where does Dalits fit** 10:26

19 **into this structure that you've described not --** 10:26

20 **I'm not asking the history of the structure. I'm** 10:26

21 **asking based on this construct that you've** 10:26

22 **described where do Dalits fit? Do they sit** 10:26

23 **beneath the four categories that you described?** 10:26

24 **MR. TWERSKY: Objection. It** 10:26

25 **mischaracterizes his testimony. Go ahead,** 10:26

Praveen Sinha, PhD, 8/11/2023

1 **Professor.** 10:26

2 A. According to Hindu tradition there are 10:26

3 four varnas and everybody falls in one of those 10:26

4 four depending on what they do in life. 10:26

5 **Q. What's a Dalit?** 10:26

6 A. Shudra. Fourth category. 10:26

7 **Q. That's it?** 10:26

8 A. That's it. 10:26

9 **Q. Okay. So, going back to our example of** 10:26

10 **the classroom, you said that you couldn't conceive** 10:26

11 **of a caste-based insult. So, what if in the** 10:26

12 **classroom a student were to say to another student** 10:27

13 **I don't want you in my working group because** 10:27

14 **you're a Shudra, is that something that CSU policy** 10:27

15 **should prohibit or not?** 10:27

16 **MR. TWERSKY: Objection. Improper** 10:27

17 **hypothetical. Go ahead. You can answer,** 10:27

18 **Professor.** 10:27

19 A. No. Any insult should be absolutely 10:27

20 unacceptable. 10:27

21 **BY MR. MICHALOWSKI:** 10:27

22 **Q. Including the discrimination based on** 10:27

23 **caste?** 10:27

24 **MR. TWERSKY: Objection. You're** 10:27

25 **mischaracterizing his testimony.** 10:27

Praveen Sinha, PhD, 8/11/2023

1 And the third is Mahabharat, M-A-H-A-B-H-A-R-A-T. 11:40
2 THE COURT REPORTER: Thank you. 11:41
3 BY MR. MICHALOWSKI: 11:41
4 Q. Do you have any views related to caste 11:41
5 that derive from your religious beliefs? 11:41
6 MR. TWERSKY: Object to the form. 11:41
7 THE WITNESS: Can I answer it? 11:41
8 MR. TWERSKY: Yes, yes. Yes. 11:41
9 A. I think I already outlined it what my 11:41
10 belief about the caste varna system is. But if 11:41
11 you want I can elaborate. 11:41
12 BY MR. MICHALOWSKI: 11:41
13 Q. Yes, I would like you to elaborate. 11:41
14 A. According to Hindu belief system there 11:41
15 are four varnas we determine what your occupation 11:41
16 is and they can be interchanged. So, as a 11:41
17 Professor or a lawyer like you are, you're a 11:41
18 Brahman. As a trader you will be in the Vaisha 11:41
19 category. As a blue collar worker you will be in 11:42
20 the Shudra category. If you're in the military, 11:42
21 firefighter you will be Kshatriya. That's what my 11:42
22 belief about the varna system is. 11:42
23 Q. And, do you have any -- 11:42
24 A. Can I complete one more? 11:42
25 Q. Of course, please. 11:42

Praveen Sinha, PhD, 8/11/2023

A. It is referring to the undefined caste system that is being implemented in the policy, that is being referred in the policy.

4 BY MR. MICHALOWSKI: 12:27

5 Q. And, you wrote dozens of emails related 12:27
6 to caste-based issues. When you were writing that 12:27
7 email did you know what caste meant? 12:28

8	A. When you're writing these emails or even	12:28
9	documents you have to use the word caste because	12:28
10	that is what is being used in the context of this	12:28
11	particular issue. But we know this is not what we	12:28
12	have in Hinduism. And, what we have is a varna	12:28
13	system which is not caste.	12:28

14 Q. So, caste -- you do not have caste in 12:28

15 Hinduism? 12:28

16	A. I think I said that at least five or six	12:28
17	times. Let me repeat it one last time again.	12:28
18	According to Hinduism there's a varna and jati	12:28
19	system. There is no caste. Caste is a Portuguese	12:28
20	word imposed on Hindus by the British. The word	12:28
21	caste does not exist in any Indian language.	12:28

22 Q. Okay. So, paragraph 18 when you say 12:28
23 caste, are you referring to the Portuguese word or 12:28
24 are you using a common definition of caste that 12:28
25 you understand? 12:29

1 STATE OF CALIFORNIA

2 COUNTY OF SAN DIEGO

3
4 I, Bobbie Hibbler, Certified Shorthand
5 Reporter, in and for the State of California,
6 Certificate No. 12475, do hereby certify:

7 That the witness in the foregoing
8 deposition was by me first duly sworn to testify
9 to the truth, the whole truth, and nothing but the
10 truth in the foregoing cause; that the deposition
11 was then reported by me in shorthand and
12 transcribed, through computer-aided transcription,
13 under my direction; and that the above and
14 foregoing transcript, is a true record of the
15 testimony elicited and proceedings had at said
16 deposition.

17 I do further certify that I am a
18 disinterested person and am in no way interested
19 in the outcome of this action or connection with
20 or related to any of the parties in this action or
21 to their respective counsel.

22 In witness whereof, I have hereunto
23 set my hand this 18th day of August, 2023.

24
25

Bobbie Hibbler, CSR No. 12475